

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Erien Frazier, ) Case No. WDQ 14 CV 0047)  
*Plaintiff* )  
RJM Acquisitions LLC, )  
*Defendant* ) Judge \_\_\_\_\_  
 ) Trial by Jury Demanded

**COMPLAINT**

1. Plaintiff, Erien Frazier, hereby and individually sues RJM Acquisitions LLC for violations of the Fair Credit Reporting Act (FCRA) 15 U.S.C. 1681 et seq.

**PRELIMINARY STATEMENT**

2. This is an action for damages against RJM Acquisitions LLC for violations of the Fair Credit Reporting Act (FCRA) 15 U.S.C. 1681 et seq.

**JURISDICTION AND VENUE**

3. The jurisdiction of this Court is conferred by 15 U.S.C. § 1681p.
4. Venue is proper in this Court pursuant to 28 U.S.C. § 1331b.
5. This is an action for damages which do not exceed \$10,000.
6. Plaintiff, Erien Frazier, is a natural person and is a resident of the State of Maryland.

7. Defendant, RJM Acquisitions LLC, is a New York corporation, authorized to do business in the State of Maryland.

### **FACTUAL ALLEGATIONS**

8. On March 1, 2011, RJM Acquisitions LLC initiated an inquiry into Plaintiff's Trans Union consumer report without permissible purpose in violation of the Fair Credit Reporting Act (FCRA) 15 U.S.C. § 1681b (See Exhibit A).
9. On February 1, 2012, RJM Acquisitions LLC initiated an inquiry into Plaintiff's Trans Union consumer report without permissible purpose in violation of the Fair Credit Reporting Act (FCRA) 15 U.S.C. § 1681b (See Exhibit A).
10. On February 10, 2012, RJM Acquisitions LLC initiated an inquiry into Plaintiff's Trans Union consumer report without permissible purpose in violation of the Fair Credit Reporting Act (FCRA) 15 U.S.C. § 1681b (See Exhibit A).
11. Defendant, RJM Acquisitions LLC, is a debt collector attempting to collect an alleged but non-existent debt.

### **COUNT I VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT (FDCPA), 15 U.S.C. §1692 WILFUL NON-COMPLIANCE BY DEFENDANT RJM ACQUISITIONS LLC**

12. Paragraphs 1 through 11 are re-alleged as though fully set forth herein.
13. Plaintiff is a consumer within the meaning of FCRA, 15 U.S.C. § 1681 a(c).
14. RJM Acquisitions LLC is a furnisher of information within the meaning of 15 U.S.C. 1681s-2.

15. RJM Acquisitions LLC willfully violated the FCRA 15 U.S.C. § 1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. § 1681b.

WHEREFORE, Plaintiff demands judgment for damages against RJM Acquisitions LLC for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to 15 U.S.C. § 1681n.

**COUNT II**  
**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. § 1681**  
**NEGLIGENT NON-COMPLIANCE BY DEFENDANT RJM ACQUISITIONS**  
**LLC**

16. Paragraphs 1 through 11 are re-alleged as though fully set forth herein.
17. Plaintiff is a consumer within the meaning of the FCRA 15 U.S.C. § 1681a(c).
18. RJM Acquisitions LLC is a furnisher of information within the meaning of the FCRA, 15 U.S.C. § 1681s-2.
19. RJM Acquisitions LLC negligently violated the FCRA 15 U.S.C. § 1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. § 1681b.

WHEREFORE, Plaintiff demands judgment for damages against RJM Acquisitions LLC for actual or statutory damages, and attorney's fees costs, pursuant to 15 U.S.C. § 1681o.

**COUNT III**  
**VIOLATION OF MARYLAND COMMERCIAL L CODE § 14-1202**  
**WILFUL NON-COMPLIANCE BY DEFENDANT**  
**RJM ACQUISITIONS LLC**

20. Paragraphs 1 through 11 are re-alleged as though fully set forth herein.

21. Plaintiff is a consumer within the meaning of Maryland Comm L Code § 14-1201(c).
22. RJM Acquisitions LLC is a collector within the meaning of Maryland Comm L Code § 14-201.
23. RJM Acquisitions LLC willfully violated Maryland Comm L Code § 14-1202 by obtaining Plaintiff's consumer report without a permissible purpose.

WHEREFORE, Plaintiff demands judgment for damages against RJM Acquisitions LLC for actual or statutory damages, and attorney's fees costs, pursuant to Maryland Comm L Code § 14-203.

**COUNT IV**  
**VIOLATION OF MARYLAND COMMERCIAL L CODE § 14-1202**  
**NEGLIGENT NON-COMPLIANCE BY DEFENDANT**  
**RJM ACQUISITIONS LLC**

24. Paragraphs 1 through 11 are re-alleged as though fully set forth herein.
25. Plaintiff is a consumer within the meaning of Maryland Comm L Code § 14-1201(c).
26. RJM Acquisitions LLC is a collector within the meaning of Maryland Comm L Code § 14-201.
27. RJM Acquisitions LLC negligently violated Maryland Comm L Code § 14-1202 by obtaining Plaintiff's consumer report without a permissible purpose.

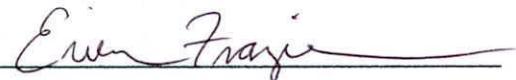
WHEREFORE, Plaintiff demands judgment for damages against defendant for actual or statutory damages statutory damages, and attorney's fees and costs, pursuant to MD Commercial Law §14-203.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.

Date: 12-30-2013

Respectfully submitted,



Erien Frazier,

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Hagerstown, MD 21740

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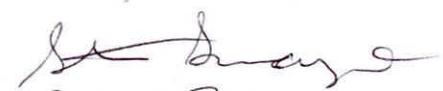
Service To:

RJM Acquisition LLC

The Corporation Trust Incorporated

351 West Camden Street

Baltimore, MD 21201

  
12-30-13